

UNITED STATES COURT OF APPEALS  
FOR THE DISTRICT OF COLUMBIA CIRCUIT

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U.S. TIRE MANUFACTURERS ASSOCIATION, )  
Petitioner, )  
v. ) Case No. 25-1041  
U.S. ENVIRONMENTAL PROTECTION )  
AGENCY, )  
Respondent. )  
\_\_\_\_\_  
)

**PETITION FOR REVIEW**

Pursuant to Clean Air Act section 307(b)(1), 42 U.S.C. § 7607(b)(1),  
Fed. R. App. P. 15, and Circuit Rule 15, U.S. Tire Manufacturers Association  
hereby petitions this Court for review of the final action of the United States  
Environmental Protection Agency entitled *National Emission Standards for  
Hazardous Air Pollutants: Rubber Tire Manufacturing*, published on  
November 29, 2024 at 89 Fed. Reg. 94,886.

A Rule 26.1 corporate disclosure statement is attached.

Dated: January 28, 2025

Respectfully submitted,

/s/ Russell S. Frye  
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## **RULE 26.1 CORPORATE DISCLOSURE STATEMENT**

Pursuant to Fed. R. App. P. 26.1 and Circuit Rule 26.1, counsel for petitioner U.S. Tire Manufacturers Association certifies as follows:

1. U.S. Tire Manufacturers Association (“USTMA”) is the national trade association for tire manufacturers that produce tires in the United States, headquartered in Washington, D.C. Its purposes include advocating for its members’ interests before federal and state policymakers and, where appropriate and necessary, in the courts and other tribunals. USTMA’s 11 member companies operate 55 tire-related manufacturing facilities in 16 states. USTMA advances a sustainable tire manufacturing industry through thought leadership and a commitment to science based public policy advocacy. U.S. tire

manufacturers are subject to, and will incur costs and operational constraints associated with, the Environmental Protection Agency's adoption of expanded standards for emissions of air pollutants from tire manufacturing plants that is the subject of the above-captioned action.

2. U.S. Tire Manufacturers Association does not have a parent corporation, and no publicly-held company has a 10 percent or greater ownership interest in U.S. Tire Manufacturers Association. U.S. Tire Manufacturers Association is a “trade association” within the meaning of Circuit Rule 26.1(b).

Dated: January 28, 2025

Respectfully submitted,

*/s/ Russell S. Frye*  
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## **CERTIFICATE OF SERVICE**

This is to certify that the foregoing Petition for Review of U.S. Tire Manufacturers Association and its Rule 26.1 Corporate Disclosure Statement were served on Respondent this 28<sup>th</sup> day of January, 2025, by placing copies in the U.S. Mail, First Class postage prepaid, addressed to each of the following:

James Payne, Acting Administrator  
Office of the Administrator (1101A)  
U.S. Environmental Protection Agency  
William Jefferson Clinton Building  
1200 Pennsylvania Avenue, N.W.  
Washington, DC 20460

Correspondence Control Unit  
Office of General Counsel (2311)  
U.S. Environmental Protection Agency  
William Jefferson Clinton Building  
1200 Pennsylvania Avenue, N.W.  
Washington, DC 20460

James McHenry, Acting Attorney General  
U.S. Department of Justice  
950 Pennsylvania Avenue, N.W.  
Washington, DC 20530

/s/ Russell S. Frye